

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Andrew R. Gross

Debtor

:
:
:
:
:

Case No.: 20-14495-mdc

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Andrew R. Gross, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on November 19, 2021.
2. The Chapter 13 filing was assigned case number 20-14495.
3. The Chapter 13 Plan was confirmed by this Honorable Court on May 20, 2021.
4. The Debtor has been approved for a loan modification by the mortgagee, Wells Fargo Bank NA for the property known as and located at 325 Peachtree Dr., Jenkintown, Pa 19046.
5. Debtor respectfully requests that he be permitted to modify his Chapter 13 Plan as a result of obtaining the modification.
6. In furtherance of this Motion, a Modified Chapter 13 Plan is being contemporaneously filed.
7. The Debtors' proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", is affordable to the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: July 27, 2021

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107